



ELMAN FREIBERG PLLC

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November 17, 2022

BY ECF

Hon. P. Kevin Castel
United States District Judge
United States District Court
Southern District of New York
500 Pearl St., Room 2260
New York, NY 10007

Re: Letter Motion for Leave to File Document Under Seal in
Jane Doe v. Yeshiva University, Andrew "Avi" Lauer, Esq., Chaim Nissel,
Seyfarth Shaw, LLP, Dov Kesselman, Esq., and Emily Miller, Esq.,
No. 1:22-cv-05405-PKC-KHP

Dear Judge Castel:

We represent defendants Seyfarth Shaw, LLP, Dov Kesselman, Esq., and Emily Miller, Esq. (collectively, the "Seyfarth Defendants") in the above action. Pursuant to Rule 5(B) of Your Honor's Individual Practices, the Seyfarth Defendants request permission to file, under seal, their Memorandum of Law Opposing Plaintiffs' Motion to Proceed Under a Pseudonym (the "Memorandum"). There is no conference scheduled before the Court.

The Memorandum contains a few quotations and paraphrases of the Affidavit of Jane Doe dated July 12, 2022 [Dkt. 13] in support of her motion to proceed under a pseudonym. Although none of our quotations or paraphrases would reveal her identity, they would reveal portions of the content of an affidavit that was filed entirely under seal. We therefore request permission file our Memorandum under seal. In accordance with Rule 5(B)(iii) of Your Honor's Individual Practices, we have (a) publicly filed a redacted copy of our Memorandum, and (b) electronically filed under seal an unredacted copy, with the proposed redactions highlighted.

Respectfully submitted,

David L. Barres
David L. Barres

cc (by ECF):

Kevin T. Mulhearn, Esq.
Attorney for Plaintiff

provided that
her identity is not
disclosed, the affidavit
(with only redacted
information) may be quoted
in a memorandum
filed on the
public
docket.
SO ORDERED
11-17-22
VSDJ

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Jaimie L. Fitzgerald, Esq.
Attorneys for the Yeshiva Defendants